

Addendum to the
Environmental Impact
Assessment Report

NISA
North Irish Sea Array

Volume 5 - Wider Schemes Chapters

Chapter 34

Major Accidents and Disasters



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34. Risk of Major Accidents and/or Disasters

North Irish Sea Array Windfarm Ltd (NISA, hereafter referred to as ‘the Developer’) has been considering the Request for Further Information (RFI) issued by An Bord Pleanála (now An Coimisiún Pleanála) as well as the third-party submissions received following public consultation. At An Coimisiún Pleanála’s behest, the Developer has also continued to consult with stakeholders in respect of the 2024 planning application throughout 2024-2026. The Developer has refined elements of the design to respond to the third-party submissions, the continued public and stakeholder consultation and the RFI (further details on the design refinements are provided in Appendix A5.1: Design Refinements). Amendments are therefore required to Chapter 34: Risk of Major Accidents and/or Disasters of the 2024 Environmental Impact Assessment Report (EIAR). Full details of consultation undertaken can be found in Appendix A1.2 in the Addendum to the EIAR.

For the purposes of clarity, this document shall be read in conjunction with the Chapter 34 submitted as part of the 2024 EIAR.

Any cross reference to a chapter, section, table, image, figure or appendix within this document is to another location within the Addendum to the EIAR unless explicitly stated otherwise. Any cross reference to anything included in the 2024 EIAR will be clearly labelled as such.

Text in bold is only used throughout this document to indicate where changes are required, and why they are required. Text in italics illustrates section(s) of the 2024 EIAR which are deleted, or quotations from other documents (as explicitly stated). Replacement text is in normal font.

Tables and diagrams which have been updated from the 2024 EIAR, or entirely new tables or diagrams, have been included in the Addendum to the EIAR. These can be identified by the “A” prefix in the caption. Any changes within the updated table, in comparison to tables within the 2024 EIAR, are indicated by grey shading in the relevant cell, column or row, as necessary. The exception here is where a table has been replaced in its entirety.

The sections relevant to Chapter 34 in the RFI are included below.

RFI Section	RFI	Relevance to Chapter
1 (b)	The scientific information provided as part of the planning application documentation should be based on up-to-date survey reports and data. Accordingly, the applicant is requested to confirm/provide justification/verification that the information submitted in support of the planning application remains relevant and appropriate at the point of submitting further information or to update same as required.	The timeframes associated with the RFI have necessitated a review of the datasets previously used in the 2024 EIAR to ensure any necessary updates to the baseline environment are captured. Therefore, a review of the baseline environment has been undertaken to comply with RFI Section 1 (b). The updates are provided in the assessment methodology in Section 34.2, the baseline in Section 34.3 and the references in Section 34.10
2 (a)	The IRCG, through the DoT, has raised concerns in relation to the layout of the proposed development with respect to search-and-rescue (SAR) access. The applicant is requested to consult with the IRCG, in addressing these concerns, and provide further information and clarification on such matters.	Continued consultation has occurred with the Irish Coast Guard (IRCG) since the submission of the 2024 EIAR and the layouts have been revised in liaison with the IRCG in response to RFI Section 2 (a). These layouts include a single line of orientation (SLoO) with a linear configuration which is accompanied by a safety justification in line with the requirements of Marine Guidance Note (MGN) 654. IRCG have confirmed they are content with these revisions and approach. These changes are acknowledged in the Risk Assessment in Section 34.5.

RFI Section	RFI	Relevance to Chapter
2 (b)	<p>The EIAR under Chapter 17, Shipping and Navigation, states that as part of embedded mitigation, the fixed layouts for Project Option 1 and Project Option 2 comply with MGN 654 requirements (Marine Guidance Note (UK) guidance, Maritime and Coastguard Agency (MCA), 2021). The applicant is advised that the DoT MSO states that the proposed layout does not comply with guidance provided in MGN 654 and the MSO strongly disagrees with the summarisation of the risk to the safety of navigation posed to commercial shipping, fishing vessels, and recreational craft transiting in proximity to the southeastern corner and the Rockabill Gap. The applicant is requested to consult with the Department of Transport MSO in addressing these concerns and provide further information and clarification on such matters.</p>	<p>At that time of the 2024 EIAR, comprehensive Irish guidance was not in place and therefore use of the UK MGN 654 (MCA, 2021) was agreed for use by relevant stakeholders. Since then, the guidance had been published by Department of Transport (DoT) and in line with its requirements; the Navigational Risk Assessment (NRA) is still informed by MGN 654. The refined layouts for Project Option 1 and Project Option 2 have a SLoO with a linear configuration which is accompanied by a safety justification (REF) in line with the requirements of MGN 654. The wind turbine (WTG) layouts for both Project Options 1 and 2 have also been set back from the south eastern corner which was central to the MSO's concerns.</p> <p>Continued consultation has occurred with the MSO since the submission of the 2024 EIAR in response to RFI Section 2 (a). The MSO has since confirmed (during a meeting in March 2026) their contentment and acceptance of the new proposed layouts noting that the PIANC guidance (PIANC, 2018) was also applied to the Rockabill Gap and resulted in an increased Structure Exclusion Zone to which the MSO have deemed suitable for safe navigation.</p> <p>These changes are acknowledged in the Risk Assessment in Section 34.5.</p>
3 (d)	<p>Incorporate the output from a), b) and c) and all other relevant updates made as a result of this request for further information, into a revised assessment of the NMPF policies, particularly Biodiversity Policy 2, Seafloor Integrity Policies 1, 2 and 3, Fisheries Policy 5 and Underwater Noise Policy 1. This revised assessment should fully account for the distinction the NMPF places on 'important' species and habitats as defined on page 35 and 36 of the NMPF....</p>	<p>An Coimisiún Pleanála, as part of its decision-making processes authorising marine development, is obliged to consider the consistency of the proposed development with the objectives of the National Marine Planning Framework (NMPF).</p> <p>The proposed development's compliance with the NMPF has been updated in line with RFI Section 3, and this is referenced in this chapter (See Section 34.2).</p>
5	<p>The Marine Institute in their observation raises concerns in relation to the methodology applied in the submitted cumulative effects assessment and the manner in which the information is presented, noting the lack of a standard Irish methodology in relation to CEA. The applicant is advised that guidance exists in the UK, namely Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment - GOV.UK, September 2024 (NSIP, 2024).</p> <p>The applicant is requested to revise the submitted cumulative assessment in line with NSIP (2024) and submit a standalone document to clearly demonstrate the CEA conclusions. In the interests of consistency and transparency, the applicant is requested to complete the assessment in accordance with the templates provided in the NSIP (2024), namely "Appendix 1: Matrix 1 - Identification of 'other development' for CEA" and "Appendix 2: Matrix 1 - Assessment matrix" (see attached Appendix B)...</p>	<p>A revised CEA, which considers the methodology and template provided in the Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment – GOV.UK, September 2024 (NSIP, 2024), has been prepared.</p> <p>The revised CEA is provided in Chapter 38 Cumulative and Inter-Related Effects, Appendix 38.1 – Onshore Long List and Appendix A38.2 Offshore Long List. The update to this chapter in relation to this, is provided in Section 34.9.</p>
10 (a)	<p>Having regard to information submitted in the EIAR, the NPWS underwater noise guidelines (NPWS, 2014), the strict protections afforded to marine mammals under the Wildlife Act 1976, as amended, in addition to observations from prescribed bodies and observers, the Board requires a comprehensive suite of noise abatement measures to be proposed and assessed in addition to the existing mitigation measures referenced in the planning application documentation...</p>	<p>The Developer has proposed a refinement to the foundation types used for the wind turbine generators (WTGs). Instead of either monopiles or jackets, only jackets will be used. Additionally, instead of installation with pin piles the jackets will be installed with suction buckets. This has resulted in the removal of piling from the construction strategy of the offshore infrastructure (see Chapter 8 for further details). Therefore, the assessment of piling as a potential risk event is no longer relevant. See Section 34.5</p>

RFI Section	RFI	Relevance to Chapter
16	There is an existing gas interconnector pipeline located on the seabed between Ireland and Scotland, which is stated in the EIAR to be located c. 400-500 metre (m) northwest of the array area (Appendix 17.1 Navigational Risk Assessment and Chapter 20). Section 15 of Appendix 17.1 relating to cumulative impacts incorrectly states there are no subsea cables/pipeline within 2 nautical mile (nm). The applicant is requested to address the proximity of the existing gas interconnector pipeline to the north of the array area, having regard to NMPF Transmission Policy 5.	Post-submission consultation with Gas Networks Ireland focused on the relationship between the proposed development and existing offshore gas infrastructure, with a focus on Interconnector 2 in accordance with RFI Section 16. Following that consultation, the Developer completed a risk assessment conforming to DNV-RP-F107 Risk Assessment of Pipeline Protection which has been shared with GNI in January 2026 which proposes appropriate mitigation measures to concludes that the risk posed to both parties is tolerable and satisfies As Low As Reasonably Practical (ALARP) methodology. Further information on the gas interconnector is provided in Section 34.2, in the baseline in Section 34.3 and assessed in Section 34.5.

34.1 Introduction

There are no changes to the section. Refer to Section 34.1 of Chapter 34 of the 2024 EIAR.

34.2 Assessment Methodology

34.2.1 General

There are no changes to the section. Refer to Section 34.2.1 of Chapter 34 of the 2024 EIAR.

34.2.2 Key Definitions

There are no changes to the section. Refer to Section 34.2.2 of Chapter 34 of the 2024 EIAR.

34.2.3 Guidance and Legislation

There are no changes to the section. Refer to Section 34.2.3 of Chapter 34 of the 2024 EIAR.

34.2.3.1 EIA Directive

There are no changes to the section. Refer to Section 34.2.3.1 of Chapter 34 of the 2024 EIAR.

34.2.3.2 Safety, Health, and Welfare Legislation

There are no changes to the section. Refer to Section 34.2.3.2 of Chapter 34 of the 2024 EIAR.

34.2.3.3 European Commission (2017) Environmental Impact Assessment of Projects- Guidance on the preparation of the Environmental Impact Assessment Report

There are no changes to the section. Refer to Section 34.2.3.3 of Chapter 34 of the 2024 EIAR.

34.2.3.4 Environmental Protection Agency (2022) Guidelines on the information to be contained in Environmental Impact Assessment Reports

There are no changes to the section. Refer to Section 34.2.3.4 of Chapter 34 of the 2024 EIAR.

34.2.3.5 National Marine Planning Framework

In response to RFI Section 3, the National Marine Planning Framework Compliance Report (Appendix 3.1 of the 2024 EIAR) has been replaced in its entirety. Therefore, reference to this document in Section 34.2.3.5 is changed to Appendix A3.1. In addition, in accordance with RFI Section 16, the NMPF Energy – Transmission Policy 5 is included in this section. Therefore, Table 34.1 of Section 34.2.3.5 is deleted and replaced with Table A34.1 Table The changes are highlighted in grey.

Table A34.1 Table Summary of NMPF policy points relevant to major accidents and/or disasters

Summary of relevant NMPF policy	Where considered in the EIAR
Safety at Sea	
<p>Safety at Sea Policy 3: All proposals for temporary or permanent fixed infrastructure in the maritime area must ensure navigational marking in accordance with appropriate international standards and ensure inclusion in relevant charts where applicable.</p>	<p>Safety at sea is discussed in Section 34.5 and mitigation measures in place to reduce the risk of major accidents and/or disasters in relation to safety at sea is discussed in Section 34.6</p> <p>Further information on the navigational marking and embedded safety design in place for the proposed development is included in Volume 3, Chapter 17: Shipping and Navigation (hereafter referred to as the ‘Shipping and Navigation Chapter’).</p>
Sports and Recreation	
<p>Sports and Recreation Policy 5: Proposals should seek to enhance water safety through provision of appropriate International Organization for Standardization (ISO) and European Committee for Standardization (CEN) compliant safety signage.</p> <p>In general, the safety of persons should be a key consideration for planners and due consideration should be given to best practice guidance for marine and coastal recreation areas endorsed by the Visitor Safety in the Countryside Group.</p>	<p>The risks of major accidents and disasters on maritime users arising from the proposed development are addressed in Section 34.5.</p> <p>Mitigation measures proposed to reduce the chance of major accidents and/or disasters as a result of the proposed development are presented in Section 34.6.</p>
Energy – Transmission	
<p>Transmission Policy 5: Proposals for construction or operation activities within one nautical mile of either of the two existing natural gas interconnector pipelines shall be avoided.</p> <p>If construction or operation activities are proposed to take place within one nautical mile of either of the two existing natural gas interconnector pipelines, the views of Gas Networks Ireland in relation to how such activities could impact the pipelines shall be taken into account and either appropriate mitigation measures put in place or the proposed activities altered.</p> <p>If construction or operation activities involve the crossing of either of the two existing natural gas interconnector pipelines by other pipelines or cables, the views of Gas Networks Ireland in relation to how such activities could impact the pipelines shall be taken into account and either</p>	<p>The closest point of the offshore development area is situated 0.52km (0.28nm) from Interconnector 2 (IC2) Scotland to Ireland (IC2) with the nearest wind turbine generators located 949m (0.51nm) /880m (0.48nm) in Project Option 1 and Project Option 2 respectively. IC2.</p> <p>The interaction with the construction phase of the proposed development and IC2 is assessed in Chapter 20 Infrastructure and Other Users.</p> <p>IC2 is discussed further in the baseline in Section 34.3 and the risk assessment in Section 34.5.</p>

There are no further changes to the section. Refer to Section 34.2.3.5 of Chapter 34 of the 2024 EIAR.

34.2.3.6 *Environmental Protection Agency (2014) Guidance on Assessing and Costing Environmental Liabilities*

There are no changes to the section. Refer to Section 34.2.3.6 of Chapter 34 of the 2024 EIAR.

34.2.3.7 *Department of the Environment, Heritage and Local Government (2010) A Framework for Major Emergency Management Guidance Document 1-A Guide to Risk Assessment in Major Emergency Management*

There are no changes to the section. Refer to Section 34.2.3.7 of Chapter 34 of the 2024 EIAR.

34.2.3.8 *Institute for Environmental Management and Assessment (2020) Major Accidents and Disasters in EIA – A Primer*

There are no changes to the section. Refer to Section 34.2.3.8 of Chapter 34 of the 2024 EIAR.

34.2.3.9 *External Plans and Assessments*

In response to RFI Section 1 (b), a review of external plans and assessments was undertaken.

The change required to this section is updating reference to new National Risk Assessment and correction of an administrative error in the reference to the Major Emergency Plan of Fingal County Council. Therefore, the following text is deleted:

- *“Major Emergency Plan of Fingal County Council (FCC) (FCC, 2011).*
- *National Risk Assessment: Overview of Strategic Risks 2023 (Government of Ireland, 2023)”.*

And replaced with:

- Major Emergency Plan of Fingal County Council (FCC) (FCC, 2023).
- National Risk Assessment: Overview of Strategic Risks 2024 (Government of Ireland, 2024).

34.2.3.10 Project Documents

The Developer has refined elements of the design to respond to the third-party submissions, the continued public and stakeholder consultation and the RFI (see Appendix A5.1 for further information). Amendments are therefore required to chapters in the 2024 EIAR, and as part of this, the Offshore Environmental Management Plan and Onshore Construction Environmental Management Plan. Therefore, the following text in Section 34.2.3.10 of the 2024 EIAR will be deleted:

“The Offshore Environmental Management Plan (Offshore EMP) (Appendix 6.1) and Onshore Construction Environmental Management Plan (Onshore CEMP) (Appendix 9.1) also informed the assessment.”

And replaced with:

The Offshore Environmental Management Plan (Offshore EMP) (Appendix 6.1 of the 2024 EIAR and Appendix A6.1) and Onshore Construction Environmental Management Plan (Onshore CEMP) (Appendix 9.1 of the 2024 EIAR and Appendix A9.1) also informed the assessment.

There are no further changes to the section. Refer to Section 34.2.3.10 of Chapter 34 of the 2024 EIAR.

34.2.4 Study Area

There are no changes to the section. Refer to Section 34.2.4 of Chapter 34 of the 2024 EIAR.

34.2.5 Data Collection and Collation

There are no changes to the section. Refer to Section 34.2.5 of Chapter 34 of the 2024 EIAR.

34.2.6 Impact Assessment Methodology

34.2.6.1 Risk Assessment Methodology

There are no changes to the section. Refer to Section 34.2.6.1 of Chapter 34 of the 2024 EIAR.

34.2.6.2 Identification of Potential Risk Events

There are no changes to the section. Refer to Section 34.2.6.2 of Chapter 34 of the 2024 EIAR.

34.2.6.3 Likelihood Classification

There are no changes to the section. Refer to Section 34.2.6.3 of Chapter 34 of the 2024 EIAR.

34.2.6.4 Classification of Consequence

There are no changes to the section. Refer to Section 34.2.6.4 of Chapter 34 of the 2024 EIAR.

34.2.6.5 Risk Evaluation

There are no changes to the section. Refer to Section 34.2.6.5 of Chapter 34 of the 2024 EIAR.

34.3 Baseline Environment

34.3.1 Natural Disasters

There are no changes to the section. Refer to Section 34.3.1 of Chapter 34 of the 2024 EIAR.

34.3.2 Severe Weather Events and Climate Change Predictions

In response to RFI Section 1 (b), a review of relevant legislation was undertaken. The change required to this section is updating the references to the relevant County Council’s Climate Change Action Plans and the diagrams from the Fingal and Dublin City Council Climate Change Action Plans. Diagram 34.1 is deleted and replaced with Diagram A34.1 and A34.2, and the reference number for Diagram 34.2 is changed to A34.3 with “draft” removed from the title in reference to Louth County Council Climate Action Plan 2024-2029).

In addition, reference to the 2020 EPA research on climate is removed as this has been superseded by 2025 research which is less relevant in the context of this chapter.

Therefore, the Section 34.2.3.2 of Chapter 34 of the 2024 EIAR is deleted in its entirety and replaced with the following:

There has been a recent increase in the number of severe weather events in Ireland, including those leading to flash flooding, snow, both lower and higher temperatures than usual and strong winds. Highlights of observed climate change for Fingal and Dublin City, and an historic timeline of severe weather events in Meath and Louth as noted in the Fingal County Council Climate Change Action Plan 2024-2029, the Dublin City Council Climate Change Action Plan 2024-2029, the Meath County Council Climate Action Plan 2024-2029 and the Louth County Council Climate Action Plan 2024-2029, are presented in Diagrams A34.1, A34.2 and A34.3.

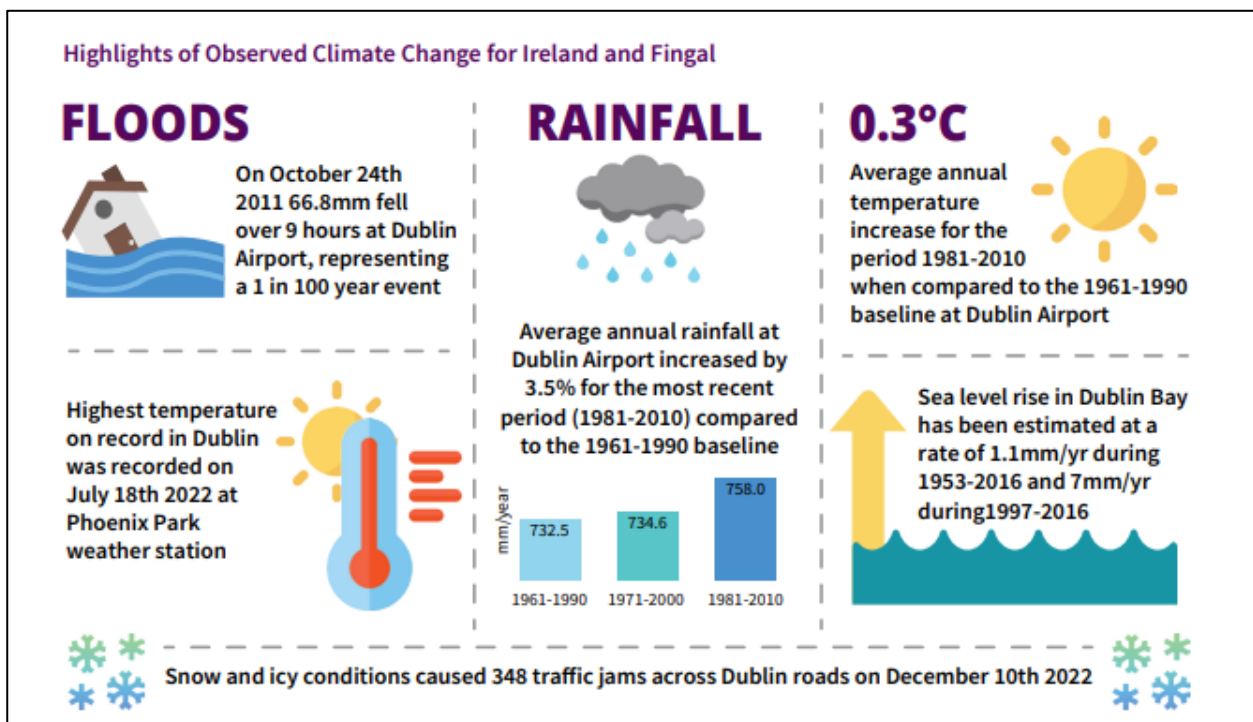


Diagram A34.1 Highlights of observed climate change for Ireland and Fingal (Source: Fingal County Council Climate Change Action Plan 2024-2029)

Highlights of Observed Climate Change for Ireland and Dublin City

Floods



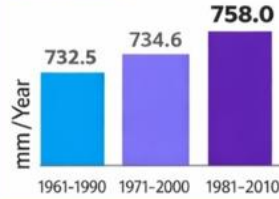
On October 24th 2011, 66.8mm fell over 9 hours at Dublin Airport, representing 1 in 100-year event¹³



Highest temperature on Record in Dublin was recorded on Jul 18th 2022 at Phoenix Park weather station¹²

Rainfall

Average annual rainfall at Dublin Airport increased by 3.5% for the most recent period (1981-2010) compared to the 1961-1990 baseline.¹²



0.3°C

Average annual temperature increase for the 1981-2010 baseline when compared to the 1961-1990 baseline at Dublin Airport¹²



Sea level rise in Dublin Bay has been estimated at a rate of 1.1 mm yr⁻¹ during 1953-2016 and 7 mm yr⁻¹ during 1997-2016¹⁵



Snow and icy conditions caused 348 traffic jams across Dublin roads on December 10th 2022.¹⁴

Diagram A34.2 Highlights of observed climate change for Ireland and Dublin City (Source: Dublin City Council Climate Action Plan 2024-2029)

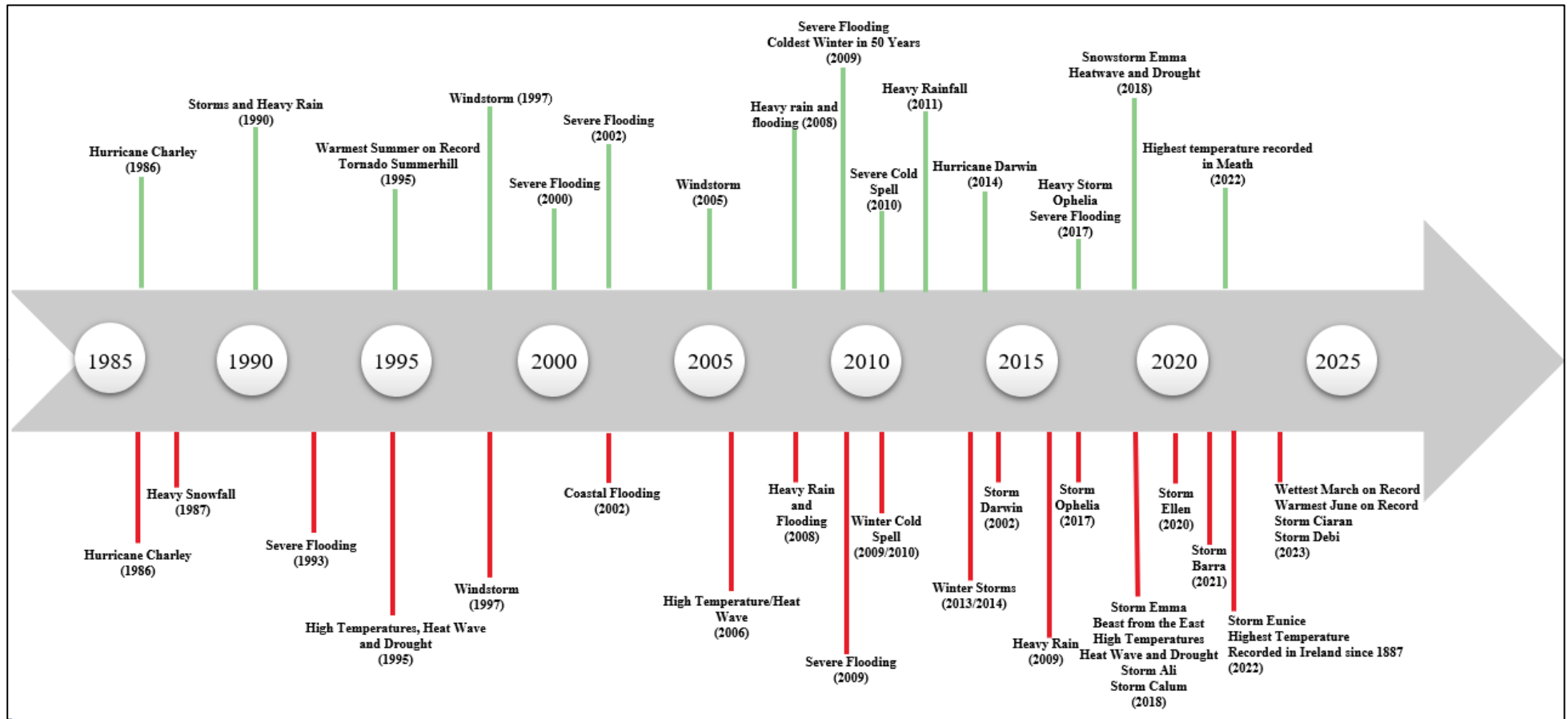


Diagram A34.3 Timeline of Major Climatic Events in Meath (outlined in Green) and Louth (outlined in Red) (Source: Meath County Council Climate Action Plan 2024-2029 and Louth County Council Climate Action Plan 2024-2029)

34.3.3 Flooding

There are no changes to the section. Refer to Section 34.3.3 of Chapter 34 of the 2024 EIAR.

34.3.4 Industrial Licensed Sites

The only change to this section is correction of an administrative error. Reference to Figure 7.4 should have been Figure 7.3. Therefore, the following text is deleted:

“The sites are shown on Figure 7.4 in Volume 7A.”

And replaced with:

The sites are shown on Figure 7.3 in Volume 7A.

There are further no changes to the section. Refer to Section 34.3.4 of Chapter 34 of the 2024 EIAR.

34.3.5 Seveso Sites

There are no changes to the section. Refer to Section 34.3.5 of Chapter 34 of the 2024 EIAR.

34.3.6 High-Pressure Natural Gas Pipelines

In response to RFI 16 regarding the gas interconnector pipeline located on the seabed between Ireland and Scotland, further details on Interconnector 2, in relation to the array area, are provided at the start of this section. In addition, the change to this section is a correction of the administrative error regarding Figure 7.4. For clarity, reference to Figure 7.4 should have been Figure 7.3 throughout this section.

There are two gas pipelines (Interconnector 1 and 2) in proximity to the proposed development, both of which are gas interconnector pipelines connecting land points from Ireland to mainland UK. Interconnector 2 passes approximately 0.28nm (0.52km) to the north-west of the array area at its closest point. This pipeline connects Gormanston in County Meath, Ireland to Brighthouse Bay in Moffat, Scotland.

There are further no changes to the section. Refer to Section 34.3.6 of Chapter 34 of the 2024 EIAR.

34.3.7 East -West Electricity Interconnector (EWIC)

The only change to this section is correction of the administrative error regarding Figure 7.4. For clarity, reference to Figure 7.4 should have been Figure 7.3 in this section.

There are further no changes to the section. Refer to Section 34.3.7 of Chapter 34 of the 2024 EIAR.

34.3.8 Vulnerability of the Surrounding Area

There are no changes to the section. Refer to Section 34.3.8 of Chapter 34 of the 2024 EIAR.

34.3.9 Shipping and Navigation

There are no changes to the section. Refer to Section 34.3.9 of Chapter 34 of the 2024 EIAR.

34.3.10 Unexploded Ordnance

There are no changes to the section. Refer to Section 34.3.10 of Chapter 34 of the 2024 EIAR.

34.4 Characteristics of the Proposed Development

It is noted that there has been design refinements to Project Options 1 and 2 in response to RFIs, third-party submissions and the continued public and stakeholder consultation (see Appendix A5.1). However, given this section is an overview of the project phases, there are no changes to the section.

Refer to Section 34.4 of Chapter 34 of the 2024 EIAR.

34.5 Potential Effects

34.5.1 Do-Nothing Scenario

There are no changes to the section. Refer to Section 34.5.1 of Chapter 34 of the 2024 EIAR.

34.5.2 Construction Phase

As a result of the design refinements to Project Options 1 and 2 (see Appendix A5.1 for further information), piling will no longer be required. Therefore, this section shall be updated to delete the reference to 800T piles in the Risk ID C16 (Major crane/lifting equipment failures and operations) in Table 34.5 of the 2024 EIAR.

In addition, in accordance with RFI Section 16 (proximity of Interconnector 2 pipeline to the north of the array area), a new potential risk event has been added to Table 34.5. Accordingly, a new row is added to the end of Table 34.5 of the 2024 EIAR:

Risk ID	Potential Risk Event	Possible Cause
C29	Damage to Interconnector 2 during offshore construction	<ul style="list-style-type: none">• Anchors dropped or dragged• Dropped objects

There are no further changes to the section. Refer to Section 34.5.2 of Chapter 34 of the 2024 EIAR.

34.5.3 Operational Phase

In accordance with RFI Section 16, a new potential risk event has been added to Table 34.5. Accordingly, a new row is added to the end of Table 34.6 of the 2024 EIAR:

Risk ID	Potential Risk Event	Possible Cause
O19	Damage to Interconnector 2 during offshore operation	<ul style="list-style-type: none">• Anchors dropped or dragged• Dropped objects

There are no further changes to the section. Refer to Section 34.5.3 of Chapter 34 of the 2024 EIAR.

34.5.4 Decommissioning

In accordance with RFI Section 16, a new potential risk event has been added to Table 34.5. Accordingly, a new row is added to the end of Table 34.7 of the 2024 EIAR:

Risk ID	Potential Risk Event	Possible Cause
D17	Damage to Interconnector 2 during offshore decommissioning	<ul style="list-style-type: none">• Anchors dropped or dragged• Dropped object

There are no further changes to the section. Refer to Section 34.5.4 of Chapter 34 of the 2024 EIAR.

34.5.5 Risk Assessment

The change to this section is reference to onshore CEMP including the construction traffic management plan (Appendix A of the CEMP) and offshore EMP should include Appendix A9.1 and Appendix A6.1, respectively in Table 34.8. In addition, as discussed in Section 34.5.2, as a result of the design refinements piling will no longer be required so reference to 800T piles in the Risk ID C16 is deleted in Table 34.8.

In accordance with RFI Section 16 (the proximity of Interconnector 2 pipeline to the north of the array area), the assessment of the new risk event (Damage to Interconnector 2 during offshore construction, operation and decommissioning) has been added to Table 34.8. Accordingly, three new rows are added to Table 34.5 of the 2024 EIAR:

Risk ID	Potential Risk Event	Possible Cause	Environmental Effect	Likelihood Rating (1-5)	Basis of Likelihood	Consequence Rating (1-5)	Basis of Consequence	Risk Score (Consequence x Likelihood)
Construction								
C29	Damage to Interconnector 2 during offshore construction	Anchors dropped or dragged Dropped objects	Damage to infrastructure	2	Following consultation with Gas Networks Ireland, the Developer completed a risk assessment conforming to DNV-RP-F107 Risk Assessment of Pipeline Protection which proposes appropriate mitigation measures to conclude that the risk posed to both parties is tolerable and satisfies As Low As Reasonably Practical (ALARP) methodology. Therefore, damage to cables is considered 'very unlikely.	3	>3 million euro in terms of costs of property/infrastructure damage. Community functioning poorly, minimal services available.	6
Operation								
O19	Damage to Interconnector 2 during offshore construction	Anchors dropped or dragged Dropped objects	Damage to infrastructure	2	Following consultation with Gas Networks Ireland, the Developer completed a risk assessment conforming to DNV-RP-F107 Risk Assessment of Pipeline Protection which proposes appropriate mitigation measures to conclude that the risk posed to both parties is tolerable and satisfies As Low As Reasonably Practical (ALARP) methodology. Therefore, damage to cables is considered 'very unlikely.	3	>3 million euro in terms of costs of property/infrastructure damage. Community functioning poorly, minimal services available.	6
Decommission								
D17	Damage to Interconnector 2 during offshore construction	Anchors dropped or dragged Dropped objects	Damage to infrastructure	2	Following consultation with Gas Networks Ireland the Developer completed a risk assessment conforming to DNV-RP-F107 Risk Assessment of Pipeline Protection which proposes appropriate mitigation measures to conclude that the risk posed to both parties is tolerable and satisfies As Low As Reasonably Practical (ALARP) methodology. Therefore, damage to cables is considered 'very unlikely.	3	>3 million euro in terms of costs of property/infrastructure damage. Community functioning poorly, minimal services available.	6

There are no further changes to the section. Refer to Section 34.5.5 of Chapter 34 of the 2024 EIAR

34.5.6 Conclusions with Respect to Risk of Major accidents and/or Disasters

In accordance with RFI Section 16, the conclusions with respect to risk of major accidents and/or disasters has been updated to include the new risk event (Damage to Interconnector 2 during offshore construction, operation and decommissioning). Accordingly, the following text from Section 34.5.6 of the 2024 EIAR is deleted:

“From examining the plausible risks presented in Table 34.9, Risk events C1 to C12, C14 to C22, C24 to C28, O1 to O16 and D1 to D16 are in the green zone, low risk events, and below the threshold of significance set for the purposes of this assessment.”

And replaced with the following text:

From examining the plausible risks presented in Table 34.9, Risk events C1 to C12, C14 to C22, C24 to C29, O1 to O19 and D1 to D17 are in the green zone, low risk events, and below the threshold of significance set for the purposes of this assessment.

There are no further changes to the section. Refer to Section 34.5.6 of Chapter 34 of the 2024 EIAR.

34.6 Mitigation and Monitoring Measures

There are no changes to the section. Refer to Section 34.6 of Chapter 34 of the 2024 EIAR.

34.7 Residual Effects

There are no changes to this section, and therefore, no likely significant negative residual effects are predicted for the construction, operational or decommissioning phases of the proposed development. Refer to Section 34.7 of Chapter 34 of the 2024 EIAR.

34.8 Transboundary Effects

There are no changes to the section. Refer to Section 34.8 of Chapter 34 of the 2024 EIAR.

34.9 Cumulative Effects

The Cumulative Effects Assessment (CEA) is presented in Volume 6, Chapter 38: Cumulative and Inter-Related Effects. In response to RFI Section 5, the CEA has been updated to align with the UK Guidance document *Nationally Strategic Infrastructure Projects (NSIP) Advice on Cumulative Effects Assessment*. However, it should be noted that the overall conclusions of the CEA from major accidents and disasters perspective remain unchanged from the 2024 EIAR (as stated below).

Therefore, the entirety of Section 34.9 of Chapter 34 of the 2024 EIAR shall be deleted and replaced with the text herein:

A long list of “other existing and/or approved developments” which were deemed to be potentially relevant for inclusion in the cumulative impact assessment was compiled (refer to Volume 6, Chapter 38: Cumulative and Inter-related Effects (hereafter referred to as ‘Chapter 38’)). A screening exercise of the “long list” was carried out in order to determine whether each of those “other existing and/or approved developments” has the potential to give rise to likely significant cumulative effects with the proposed development from a major accidents and disasters perspective. Many of the “other existing and/or approved developments” were screened out for a number of reasons including their location, scale and nature of the project. Those projects which were “screened in” were carried forward for assessment. The results of the assessment are presented in Section 38.2.3.25 of Chapter 38.

The assessment concluded that there are no likely significant direct or indirect cumulative effects with the potential to cause a major accident or disaster or result in the proposed development being vulnerable to a major accident or disaster during the construction, operation or decommissioning phases of the proposed development.

34.10 References

The change required to Section 34.10 of Chapter 34 in the 2024 EIAR is the update of the reference list. For the purposes of clarity, the following text from Section 34.10 of Chapter 24 in the 2024 EIAR is deleted:

“Department of Environment, Heritage and Local Government (2010) A Guide to Risk Assessment in Major Emergency Management

Dublin City Council (2022) Major Emergency Plan 2022

Fingal County Council (2011) Major Emergency Plan of Fingal County Council 2011

Fingal County Council (2017) Fingal County Development Plan 2017-2023

Fingal County Council (2019) Fingal County Council Climate Change Action Plan 2019-2024

Government of Ireland (2023) National Risk Assessment 2023 – Overview of Strategic Risks

Louth County Council (2024) Draft Louth County Council Climate Action Plan 2024-2029

Louth County Council: Information on Major Emergency Planning by Louth County Council from louthcoco.ie

Nolan, P and Flanagan, J High Resolution Climate Projections for Ireland – A Multi-model Ensemble Approach, Environmental Protection Agency 2020”

And replaced with:

Environmental Protection Agency (2025) Research 471: Updated High-resolution Climate Projections for Ireland, Paul Nolan

Fingal County Council (2023) Major Emergency Plan of Fingal County Council 2023

Fingal County Council (2024) Fingal County Council Climate Change Action Plan 2024-2029

Government of Ireland (2024) National Risk Assessment 2024 – Overview of Strategic Risks

Louth County Council (2024) Louth County Council Climate Action Plan 2024-2029

And the following reference is added:

Dublin City Council (2024) Dublin City Council Climate Action Plan 2024-2029